



# EPA

## Earth Protection Services Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY // REGION IX // JANUARY 2002

## U.S. EPA ANNOUNCES COMMENT PERIOD FOR DRAFT PERMIT DECISION

### INTRODUCTION

The U.S. EPA invites you to comment on its proposed permit decisions for Earth Protection Services, Inc. (EPSI), near Phoenix, Arizona. EPA's proposed decisions will allow EPSI to (1) commercially store PCB wastes and (2) decontaminate PCB-containing lighting ballasts (see pictures on page 2). *According to EPA regulations, the action we are taking is called a PCB "Approval." However, we have referred to it here as a permit, because of the similarities with the widely understood environmental permitting process.*

### PROPOSED DECISIONS

#### (1) COMMERCIAL STORAGE

If approved, EPSI will be allowed to store a maximum of 300, 55-gallon drums (roughly 180,000 pounds or 90 tons) and 48 cubic yard storage boxes (roughly 72,000 pounds or 36 tons) of PCB waste. As part of their application, EPSI has submitted and EPA has reviewed:

- ✓ A closure plan for completion of operations
- ✓ A contingency plan to address PCB spills or releases
- ✓ A health and safety plan for EPSI employees
- ✓ Resumes for key personnel
- ✓ An environmental compliance history
- ✓ A waste tracking procedure
- ✓ The facility design/description
- ✓ A maximum storage capacity statement

### OPPORTUNITY TO COMMENT

The U.S. EPA invites you to attend a Public Meeting February 12, 2002, 7:00pm  
Fowler Elementary School (see map on back page)  
6707 W. Van Buren St., Phoenix, AZ.

You may give your **verbal comments** on EPA's proposed decision for Earth Protection Services during the meeting.

OR, you may send **written comments** no later than February 25, 2002, to:  
Christopher Rollins, Project Manager, U.S. EPA  
75 Hawthorne Street (CMD-4-2)  
San Francisco, CA 94105

The proposed permit includes the following requirements for PCB storage:

- Duration of the permit is eight years,
- EPSI must follow its written employee training plan,
- A trust fund, in the amount of \$73,617 will be set up to assure that the facility is properly closed, even if the company no longer has the money to do so itself. The trust fund is currently funded at \$41,000, and
- EPSI must notify EPA of any spills of PCBs greater than one pound.

### OTHER APPLICATIONS BEING EVALUATED

In addition to EPSI, EPA is also considering permits for Superior Special Services (doing business as Salesco) and Lighting Resources, Inc. in the Phoenix area. Salesco first received a permit from EPA in December 1994. EPA is currently considering a renewal of that permit. Lighting Resources, like EPSI, does not currently have a permit to commercially store PCB waste. Look for EPA's January 2002 fact sheet on Lighting Resources. EPA will provide notice of its draft decision for Salesco when available. For more details, you may request a copy of EPA's March 2001 Fact Sheet, by calling EPA at any of the numbers listed under "For More Information" on page 3.

## PCB WASTE ACCEPTED BY EPSI



**Fluorescent light ballasts**

The primary PCB waste processed by EPSI is fluorescent light ballasts, shown above. The ballasts are disassembled into scrap metal and wire and PCB waste. The scrap metal and wire are sold to recyclers. The PCB waste is shipped off-site for disposal (landfills) or destruction (incineration).

### (2) BALLAST DECONTAMINATION

EPA has evaluated EPSI's process to recover scrap metal and wire from lighting ballasts that contain PCBs. From this process, decontaminated wire and steel which meet EPA's PCB decontamination standard of 100 micrograms per 100 square centimeters (or 100 ug/100 cm<sup>2</sup>) is sent to off-site metal recovery ovens. These ovens, which comply with the PCB Regulations, melt the scrap metal for use in the metal manufacturing process. EPSI's waste materials, PCB capacitors and "potting compound," (a tar-like substance used to muffle the noise of ballast operations) are shipped to Toxic Substances Control Act (TSCA)-permitted chemical waste landfills or incineration facilities around the country.

The permit includes the following requirements for ballast decontamination:

- Scrap metal must contain no more than 100 ug/100 cm<sup>2</sup> of PCBs,
- Scrap metal must be sent to a facility that complies with EPA's requirements for metal recovery ovens,
- Scrap metal must be sampled annually to ensure that the decontamination standard is met,
- Samples must be analyzed by a laboratory approved by EPA.

*(Based on changes in equipment or processing, EPSI may request a more stringent decontamination standard of 10 ug/100 cm<sup>2</sup> (10 micrograms per 100 square centimeters). At that level, the scrap metal*

*would no longer have any restrictions and could be recycled at any scrap metal recycler.)*

### **NEXT STEPS IN THE PERMITTING PROCESS**

EPA will not make a final decision on the permit until we have considered all public comments. Anyone commenting on the proposed permit will receive a copy of our response to comments. EPA will provide written notice of our final decision to everyone on our mailing list.

If you did not receive this fact sheet through the mail and would like to be added to our mailing list for EPSI, please complete the "Mailing List Update" on the back page.

### **ENVIRONMENTAL JUSTICE**

EPA's goal is to ensure that all people, regardless of race, national origin or income, are protected from different impacts of environmental hazards. EPA has completed an Environmental Justice Analysis for the community around EPSI: 21% of the households within three miles of EPSI have incomes below the poverty level; nearly 55% are minority residents and the area has more EPA-regulated facilities than the average for the Phoenix Metropolitan Area.

EPA has proposed the following conditions specifically to address environmental justice concerns at this facility:

- Indoor air monitoring to ensure workers are adequately protected,
- Outdoor air monitoring to ensure air emissions from this facility do not exceed acceptable limits,
- Making annual environmental reports and spill reports available at the closest public library (Desert Sage Branch, see "For More Information"),
- Prohibiting the facility from decontaminating transformers without adequate public notice, and
- Including public notice requirements for major permit modifications (e.g. expanding the facility's storage capacity).

### **OTHER NOTEWORTHY ISSUES AND PERMIT PROVISIONS**

In EPA's September 2000 inspection, we discovered PCB contamination along railroad tracks behind the facility. EPA and the facility have signed a compliance agreement to ensure cleanup of the area. The permit will ensure that doors remain permanently closed to prevent further contamination of this area.

## FOR MORE INFORMATION

*If you have any questions about EPA's activities at this site, you may contact:*

**Christopher Rollins**  
EPA Project Manager  
(415) 947-4166  
rollins.christopher@epa.gov

**Norman Calero**  
EPA Environmental  
Justice Coordinator  
(415) 972-3793  
calero.norman@epa.gov

*For information from Arizona Department of Environmental Quality, please contact:*

**Anthony Leverock**  
Arizona Department of Environmental Quality  
3033 N. Central Avenue  
Phoenix, AZ 85012  
(602) 207-4160

Or leave a message on EPA's toll free line: (800) 231-3075

The EPSI permit application, EPA's draft permit and selected correspondence related to the permit are available for review at the locations below:

**Phoenix Public Library  
Desert Sage Branch  
7602 West Encanto Blvd.  
Phoenix, AZ 85035  
(602) 543-5276**

**Phoenix Public Library  
Ocotillo Branch  
102 West Southern Ave.  
Phoenix, AZ 85041  
(602) 262-6694**



### MAILING LIST UPDATE

We need your help to update our mailing list. Please check off the box which fits your situation and complete the coupon or call (415) 947-4166 to give us this information.

☐ Add me to the mailing list

Mark each facility you are interested in:

☐ Earth Protection ☐ Lighting Resources ☐ Superior

☐ Change my address

☐ Delete me from the mailing list

May we share your name and address with the Arizona Department of Environmental Quality? ☐ Yes ☐ No

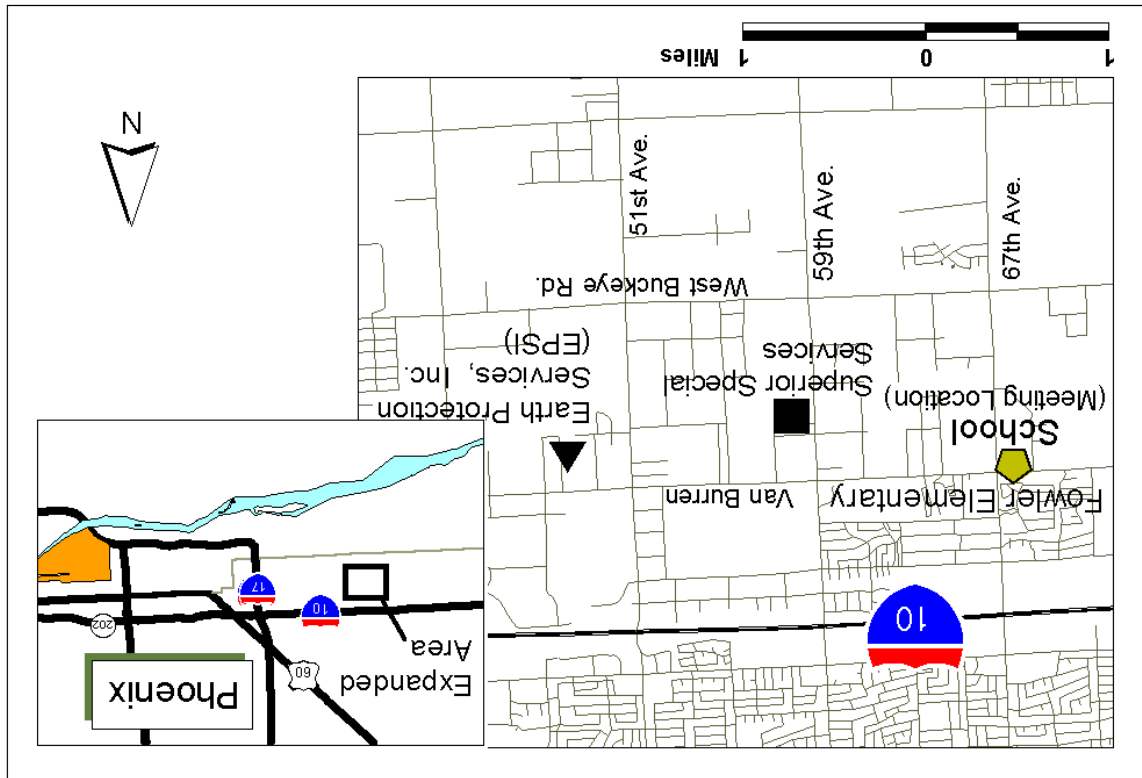
**Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**City, State, Zip:** \_\_\_\_\_

Return to:  
**Christopher Rollins (CMD-4-2)**  
**U.S. Environmental Protection Agency**  
**75 Hawthorne Street**  
**San Francisco, CA 94105**

MEETING LOCATION: Fowler Elementary School, 6707 W. Van Buren St., Phoenix, AZ



**PUBLIC MEETING ON FEBRUARY 12, 2002 FOR EARTH PROTECTION SERVICES, INC.**

U.S. EPA, Region 9  
75 Hawthorne Street (CMD-4-2)  
San Francisco, CA 94105-3901  
Attention: Tom Kelly

Official Business  
Penalty for Private Use, \$300

Address Service Requested

FIRST CLASS  
MAIL  
Postage & Fees  
PAID  
U.S. EPA  
Permit No. 35